



December 4, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, D.C. 20554

RE: **Ex parte filing** in WC Docket No. 10-90

Dear Ms. Dortch:

In the October 10, 2012 GVNW and ASTAC ex parte filed October 12, we referenced a discussion about our approach in calculating the revised road miles and road crossings and provided elaboration on the types of trails that traverse the fragile tundra in ASTAC territory. During this discussion, Mr. Stroup requested our thoughts on whether the findings relative to ASTAC would be applicable to other Alaska companies.

After a short clarifying call on October 19 by the undersigned with Craig Stroup, James Eisner, and Katie King, we completed the research and the undersigned discussed the results of the research with Craig Stroup, James Eisner and Suzanne Yelen on December 4, 2012. In summary, we found no other Alaska carriers that had a material misstatement of road miles and road crossings data as was the case for ASTAC based on data available to us as of the date of this ex parte.

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 12/4/12

Jeffry H. Smith
Vice-President and Division Manager, Western Region
Chairman of the Board of Directors

Copy to
Amy Bender, FCC
Craig Stroup, FCC
Steve Merriam, Arctic Slope Telephone Association Cooperative
Matthew Tycksen, GVNW